

# PSJ3

# Exhibit 205

**Memorandum**

Subject

Conference Call with Mr. John Gilbert  
(DFN: 060-06.05)


Date

DEC - 6 2005

To

Joseph T. Rannazzisi  
Acting Deputy Assistant Administrator  
Office of Diversion Control

From

  
Michael R. Mapes, Chief  
E-Commerce Section  
Office of Diversion Control

On November 28, 2005, Mr. John Gilbert, Legal Counsel, representing the McKesson Corporation, contacted Michael R. Mapes and Kyle J. Wright responding to questions about sales of controlled substances by the McKesson Corporation to six Internet pharmacies located in the Miami Field Division. The questions to the McKesson Corporation were based upon the October ARCOS reports.

McKesson Corporation was briefed by the DEA on September 1, 2005, about sales of controlled substances to illicit Internet pharmacies. During this briefing, McKesson Corporation was provided with information to identify potential illicit Internet pharmacies, advised that hydrocodone, Alprazolam, and Phentermine were the preferred controlled substances in this illicit market, and actions which McKesson Corporation could implement to prevent sales to illicit Internet pharmacies. McKesson Corporation stated at the conclusion of this briefing they understood the policy and regulations and would fully cooperate.

The ARCOS reports for the month of October revealed that the McKesson distribution center in Lakeland, Florida, had distributed over two million dosage units of hydrocodone to six suspected illicit Internet pharmacies. The Miami Field Division advised that the McKesson Corporation filed suspicious order reports involving these same pharmacies. Additionally, one of the illicit Internet pharmacies identified in the October report had been specifically brought to McKesson Corporation's attention at the September briefing.

Mr. Gilbert stated that effective this date, these 6 pharmacies would be restricted to no more than 300 cumulative dosage units of any one or all hydrocodone product per day, and no more than 9,000 dosage units per month. Additionally, McKesson Corporation was running a detailed report of all controlled substances sales for the previous 30-60 days of these 6 pharmacies. E-Commerce requested and should be provided a copy of this report.

Mr. Gilbert further stated that he had been in conference with senior management of McKesson Corporation, which was now conducting a top to bottom review of the corporation's policies and procedures.

Mr. Gilbert asked if Show Cause proceedings were being initiated against the Lakeland, Florida, McKesson distribution center. Mr. Mapes responded that any decision about an Order to Show Cause would be made by the DEA Office of Chief Counsel.

Mr. Gilbert requested that as soon as all the controlled substance reports were completed and the procedures implemented, that a meeting between the DEA and McKesson Corporation be set up to once again review the actions taken by McKesson Corporation and assure that they were compliant with the policies and regulations of the DEA. Mr. Mapes agreed that such a meeting was needed.

Upon receipt of the controlled substance reports from McKesson Corporation, a meeting date will be scheduled.

Any questions pertaining to this memorandum should be directed to Michael Mapes at (703) 653-2048 or Kyle Wright at (703) 653-2103.

cc: Michael Heald, OE  
Denise Curry, OD/D  
DPM Barbara McGrath  
Miami Field Division